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**From:** Gervais, Gregory [Gervais.Gregory@epa.gov]  
**Sent:** 11/16/2021 1:33:32 PM  
**To:** Hockey, David [Hockey.David@epa.gov]; Torres, Ramon [Torres.Ramon@epa.gov]; Chaffins, Randall [Chaffins.Randall@epa.gov]; Adams, Glenn [Adams.Glenn@epa.gov]  
**Subject:** FW: ORR follow-up

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**From:** Lowery, Brigid <Lowery.Bridgid@epa.gov>  
**Sent:** Monday, November 15, 2021 7:20 PM  
**To:** Stalcup, Dana <Stalcup.Dana@epa.gov>; Douchand, Larry <Douchand.Larry@epa.gov>; Fitz-James, Schatzi <Fitz-James.Schatzi@epa.gov>; Poore, Christine <Poore.Christine@epa.gov>; Denman, Bill <Denman.Bill@epa.gov>  
**Cc:** Gervais, Gregory <Gervais.Gregory@epa.gov>  
**Subject:** ORR follow-up

Here is a potential outline for the remaining issues based on call with Greg tonight.

1. Use of site-specific values instead of default assumptions in the CWA
  - a. What is the rationale for not using the default assumptions in the CWA?
  - b. Are the assumptions justifiable and allowable under the Clean Water Act? - Need OW's opinion.
  - c. How do the results differ from the CWA defaults?
  - d. Could add pros/cons from paper?
2. Ensuring a process that allows for meaningful public engagement and transparency
  - a. Release three fact sheets OR a revised PP – pros/cons
  - b. Include effluent discharge limits OR postpone effluent discharge limits and include in-stream pollution concentration limits – pros/cons

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